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THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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BACKPAGE.COM, LLC,

Plaintiff,

v.

JOHN JAY HOFFMAN, Acting  
Attorney General of the  
State of New Jersey; et al.,

Defendants.

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THE INTERNET ARCHIVE,

Plaintiff,

v.

JOHN JAY HOFFMAN, Acting  
Attorney General of the  
State of New Jersey, et al.,

Defendants.

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HON. DENNIS M. CAVANAUGH, U.S.D.J.

Civil Action No. 13-3952

Civil Action No. 13-3953

DECLARATION OF LISA A. SHEA IN  
OPPOSITION TO APPLICATION FOR  
A PRELIMINARY INJUNCTION

I, Lisa A. Shea, Badge Number 1362, declare and say:

1. I am a Lieutenant with the State of New Jersey, Department of Law and

Public Safety, Division of Criminal Justice. I have been employed with the Division of Criminal Justice for approximately 15 years. Approximately 5 months ago, I was assigned to supervise the Human Trafficking Unit. I make this Declaration in the performance of my official duties as a law enforcement officer of the State of New Jersey.

2. I am authorized to conduct investigations and enforce criminal statutes throughout the State of New Jersey. I am a graduate of Trenton State College (now known as the College of New Jersey), where I received a Bachelor of Science Degree in Law and Justice. I am also a graduate of Middlesex County College, where I completed a two year program and received my Paralegal Certificate and Associates Degree. Throughout my career in law enforcement, I have attended numerous courses and seminars in criminal investigations. Included in the instruction that I have received is the New Jersey Division of Criminal Justice Basic Training Course for State Investigators and Detectives, which I completed at the Division of Criminal Justice Academy. From this Academy, I received intensive training in the New Jersey Criminal Code and all aspects of police and investigative work. In addition, I recently attended training that focused on detecting and conducting investigations of human trafficking.

3. In the course of fulfilling my official responsibilities, I have had the opportunity to investigate several cases of sex trafficking. Based on my training and experience, it is fair to say that the internet has become the preferred means of advertising the availability of prostitutes. This is so for several reasons including that internet advertising can be purchased and published more quickly than in traditional media thereby allowing pimps to move victims quickly to different locations.

4. Based on my training and experience, I have learned that the website Backpage.com, and similar classified advertisement websites, frequently contain advertisements

or offers that I strongly believe are for prostitution. In particular, I have participated in two criminal investigations in which the advertisements for illegal sexual services were placed on Backpage.com. In those two cases, either the pimp, or the victim at the direction of the pimp, placed the advertisements on Backpage.com.

5. On-line advertising of commercial sex acts on classified advertising websites, such as Backpage.com, promote and facilitate commercial sex acts that could potentially include minors. Reducing the publication of these advertisements will in turn reduce child sex trafficking.

6. On July 19, 2013, I conducted a random review of advertisements on Backpage.com's New Jersey website, adult escorts category. I reviewed several advertisements that I strongly believe were for prostitution. Many of the advertisements were accompanied by provocative photographs of scantily clad women. I did not see any advertisements which appeared to involve "legitimate" adult escort services.

7. For the Court's information, I have attached as Exhibit A some examples of these advertisements with accompanying photos. Please note that any identifying information of the persons presented, as well as identifying features in the photographs, was redacted for purposes of this submission.

8. Finally, attached as Exhibit B is a 2012 article from the online version of the Wall Street Journal addressing Backpage.com.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Signed at Trenton, New Jersey this 19<sup>th</sup> day of July, 2013.

Lisa A. Shea  
Lisa A. Shea

# **EXHIBIT A**

central jersey, nj free classifieds

[Post an Ad](#)

[backpage.com](#) > [central jersey adult entertainment](#) > [central jersey escorts](#)

[Report Ad](#)

## ~♥~ Don't You Want To Be Inside Of Me!!! ~♥~ - 21

Posted: Friday, July 19, 2013 10:18 AM

Hello Gentlemen I'm CHARISMA and I want you inside of me. I know you've never tasted anything as good as me. I'm so sweet that I'll make your toes curl. So be prepared because once you taste me you'll find out just what heaven is like. I know you shouldn't have too much chocolate, but you don't want to miss out on this chocolate!!!

I ACCEPT MAJOR CREDIT CARDS!!!

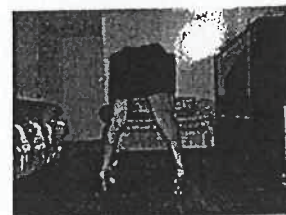
HURRY I'M ONLY HERE UNTIL 2PM!!!

PLEASE NO BLOCKED CALLS OR TEXT MESSAGES I WILL NOT RESPOND!!!

Poster's age: 21

- Location: Central Jersey, WOODBRIDGE INCALLS
- Post ID: 13542973 centraljersey

[Email this ad](#)



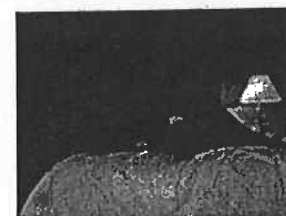
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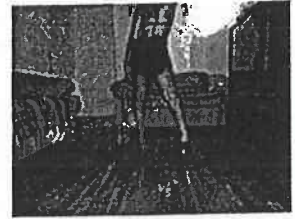
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DIAMOND here Lets shine together - central jersey escorts - backpage.com

central jersey, nj free classifieds

[Post an Ad](#)[backpage.com](#) > [central jersey adult entertainment](#) > [central jersey escorts](#)[Report Ad](#)**DIAMOND here Lets shine together - 19**

Posted: Thursday, July 18, 2013 8:54 AM

**Reply:** [click here](#)

Hi boys its diamond lets enjoy each others company tell me how I can relieve you . I do what you ask making things easy.

FETISH friendly girlfriend friendly I do dominating roll playing dinner dates I specialize in massages and body rubs even conversational dates I'm here to make things easier for you.

Outcalls ask bout \$60 special I'm worth your time none rushed service. [REDACTED] let's have fun....

Poster's age: 19

- Location: Central Jersey, Outcalls - in calls

- Post ID: 15291267 centraljersey

- Other ads by this user:

[Diamond lets shine Bright - 18](#) (Outcalls) [adult entertainment: escorts](#)

[Independent looking for DRIVER daytime n night - 20](#) (North Jersey) [adult entertainment: adult jobs](#)

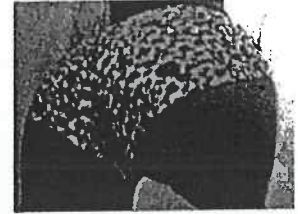
[DRIVR wanted - 22](#) (woodbridge 1-9) [adult entertainment: adult jobs](#)

[Email this ad](#)



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[Post an Ad](#)

[backpage.com](#) > [central jersey adult entertainment](#) > [central jersey escorts](#)

[Report Ad](#)

## KILLER CURVES, I KiSS ♥ PR0STATE MASSAGE & FETiSH FRIENDLY ℒ» Women Welcomed \*60-15m\*80-30m\* - 24

Posted: Friday, July 19, 2013 10:26 AM

Reply: [click here](#)

\*:\*:\* IVY IS BACK!!! \*:\*:\*

I'm what you've been searching for, look no further!

★

Come over and relax, you can experience the ultimate pleasure with me!

★

Allow me to caress & pamper you.

★

I am gentle, sensual, & open minded.

★

Men and WOMEN WELCOMED! I'll be your best kept secret!

\*:\*:\* POISON IVY :\*:~

PROSTATE MASSAGE & BLÄCK BÈRRY JUICÈ AVAILABLE

Poster's age: 24

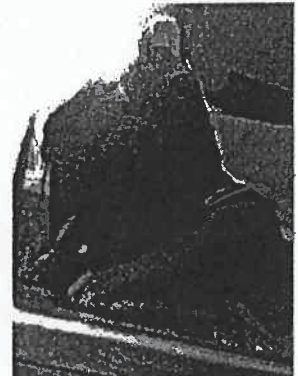
• Location: Central Jersey, UNION/ Hillside/ SPRINGFIELD/ \*Incall\*

• Post ID: 11521041 centraljersey

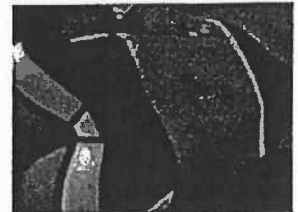
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Not accepting text  
or blocked calls. No bad  
language or discussion  
of my services over  
the phone.

**LEGAL DISCLAIMER:**

All interactions are for your self  
consentment only anything  
else that may occur is between two or  
more consenting adults of legal age.  
By contacting me you agree that this is  
not an offer of prostitution and that  
you are not affiliated with any law  
enforcement agency.

central jersey, nj free classifieds

[Post an Ad](#)[backpage.com > central jersey adult entertainment > central jersey escorts](#)[Report Ad](#)**\*L-A-T-I-N\_BRAZILIAN-N\*E\*W\_GI-R-L-S\_@T-R-O-P-I-C-A-L\_SPA**  
( [REDACTED] ) - 22

Posted: Tuesday, July 16, 2013 3:36 PM

Reply: [click here](#)

HY GENTLEMENS COME N VISIT US TODAY N GET A GREAT AMAZING SPECIALS!!THE BEST NEW YOUNG LATIN AMERICAN N BRASILIAN GIRLS ARE WAITING FOR U TO PROVIDE U A RELAXING SWEETISH BODY-RUB WITH A TABLE

Poster's age: 22

• Location: Central Jersey, CENTRAL NJ

• Post ID: 13443804 centraljersey

• Other ads by this user:

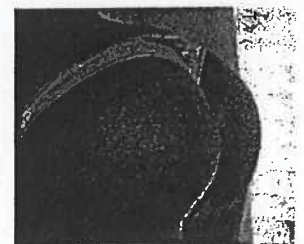
~SUMMER~SPECIALS!!BYA~BRUNET~LATINAYOUNG GIRL~-23 [REDACTED]  
(CENTRAL NJ) [adult entertainment: escorts](#)

The Best New Latin Brasilian-Girls TUESDAY-Specialss-  
22 [REDACTED] (CENTRAL NJ) [adult entertainment: body rubs](#)

\*CARIBBEAN SWEET CARMEL LATIN GIRL SPECIALS\*-22 [REDACTED]  
(North Jersey) [adult entertainment: escorts](#)

\*LATINAS @@@BRAZILIAN \*N-E-W\* S-T-A-F-F- [REDACTED] - 23 [REDACTED]  
(CENTRAL NJ) [adult entertainment: escorts](#)

\*\*~S U P E R\*~\*L\*O\*V\*E\*L\*Y~\*LATIN\*\*S~G\*I\*R\*L\*S~P~E~C~I~A~L~S  
-21 [REDACTED] (NNJ) [adult entertainment: escorts](#)

[Email this ad](#)[Enlarge Picture](#)[Enlarge Picture](#)[Enlarge Picture](#)



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We are young & sweet all asian girls - central jersey escorts - backpage.com

central jersey, nj free classifieds

[Post an Ad](#)

[backpage.com](#) > [central jersey adult entertainment](#) > [central jersey escorts](#)

[Report Ad](#)

## We are young & sweet all asian girls - 22

Posted: Friday, July 19, 2013 9:47 AM

Reply: [click here](#)

best girls in town  
come relax with us  
[REDACTED]

Poster's age: 22

- Location: Central Jersey, NORTH BRUNSWICK
- Post ID: 14666121 centraljersey

[Email this ad](#)



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We are young & sweet all asian girls - central jersey escorts - backpage.com

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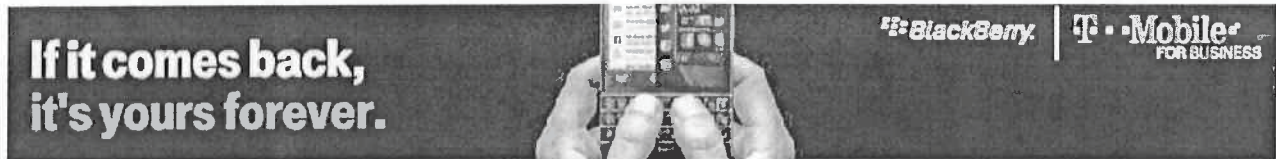


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## **EXHIBIT B**



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**THE WALL STREET JOURNAL**  
WSJ.com

MEDIA & MARKETING | September 24, 2012

## Village Voice Owner Splits Up

By KEACH HAGEY

A group of executives from Village Voice Media Holdings LLC are buying its chain of 13 alternative newspapers, including the Voice, in a deal that separates the iconic titles from the company's controversial online classified company, Backpage.com.



Jason Andrew for The Wall Street Journal

Circulation at the Village Voice newspaper is off about 40% since 2006 amid pressure from Web rivals.

The papers, which also include LA Weekly, SF Weekly and Phoenix New Times, will become part of a new, Denver-based publishing company named Voice Media Group that is majority-owned by Scott Tobias, formerly the president and chief operating officer of Village Voice Media. Mr. Tobias, who will become the new company's chief executive, will share ownership with a group of executives from Village Voice Media Holdings also moving to the new company. Terms of the deal weren't disclosed.

Michael Lacey and Jim Larkin, the majority owners of Phoenix-based Village Voice Media Holdings, will retain

control of Backpage.

The deal comes as alternative papers struggle to cope with competition from the Web, including blogs. The Village Voice, for instance, has seen its circulation fall 40%—from about 247,000 to 149,000—since 2006, the year that it was bought by Messrs. Larkin's and Lacey's company, according to the Audit Bureau of Circulations.

At the same time, over the past couple of years, Backpage has been engulfed by criticism from politicians, clergy and human-rights groups accusing the site of facilitating child sex trafficking through its online adult-services advertisements, one of many categories of ads that it offers. Backpage says that Washington state and Tennessee targeted the company's website in passing laws that seek to eradicate child sex trafficking online, and the company is fighting those laws in court.

"Backpage.com has been a distraction, there is no question," Mr. Tobias said. "It's just not about what we do."

Backpage executives argue that the company works to screen ads and report ones it suspects involve child prostitution, and that its ability to help law enforcement find sex traffickers would be lost if it shut down its adult section.

"The commercial sexual exploitation of children is an abhorrence in our society," Ms. McDougall said in an email Sunday. "It is appalling as a street crime and it is appalling as an Internet crime. It is also an extremely complex problem, and it must be fought intelligently. Backpage.com is at the forefront of fighting it intelligently online with approximately 80% of its staff dedicated to operating a 24/7 triple-tier prevention system (including an automated filter and two levels of human review) and an unparalleled law enforcement support system."

Since a similar criticism pressured Craigslist Inc. to shut down its adult-services section in 2010, Backpage has become the primary advertising outlet for such services on the Web. The site accounted for 79% of U.S. online advertising in August in categories typically described as massage or escort services in the U.S., bringing Village Voice Media Holdings an estimated \$2.3 million in monthly revenue, according to Advanced Interactive Media Group, an online classified-ad consultancy.

Mr. Tobias declined to say how that compared with the parent company's overall revenue, but added that the newspapers aren't dependent on money from Backpage.

"There was a small license fee but, but these properties are built on local ad revenue, and will continue to be built on it," he said.

**Write to** Keach Hagey at [keach.hagey@wsj.com](mailto:keach.hagey@wsj.com)

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